

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

JONATHAN RIVERA-PIEROLA,)
)
 Plaintiff,)
) Case Number
 vs.) CIV-21-616 PRW
)
 BOARD OF REGENTS for the OKLAHOMA)
 AGRICULTURAL and MECHANICAL)
 COLLEGES, et al.,)
)
 Defendant.)

VIDEOCONFERENCE DEPOSITION OF MARGI GILMOUR, DVM
TAKEN ON BEHALF OF THE PLAINTIFF
ON MAY 15, 2023
IN STILLWATER, OKLAHOMA

REPORTED BY: BRENDA SCHMITZ, CSR, RPR (VIA ZOOM)
CITY REPORTERS
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Oklahoma City, Oklahoma 73104
(405) 235-3376

Margi Gilmour, DVM
May 15, 2023

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2
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STIPULATIONS

It is hereby stipulated and agreed by and between the parties hereto, through their respective attorneys, that the video conference deposition of MARGI GILMOUR may be taken on behalf of the Plaintiff on MAY 15, 2023, in the City of Stillwater, Oklahoma by Brenda Schmitz, Certified Shorthand Reporter within and for the State of Oklahoma, and Registered Professional Reporter, taken by notice pursuant to the State of Oklahoma Rules of Civil Procedure.

It is further stipulated and agreed by and between the parties hereto, through their respective attorneys, that all objections, except as to the form of the question and the responsiveness of the answer, are reserved until the time of trial, at which time they may be made with the same force and effect as if made at the time of the taking of this deposition.

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Exhibit 18 (Excerpts)

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1 And thereupon the following witness was produced
2 by the Plaintiff:

3 MARGI GILMOUR,
4 the witness hereinbefore named, being first duly
5 cautioned and sworn remotely pursuant to Rule 34,
6 Title 12, Chapter 2, Appendix of the Oklahoma
7 Supreme Court, to testify the truth, the whole
8 truth, and nothing but the truth, testified on her
9 oath as follows:

10 DIRECT EXAMINATION

11 BY MR. BACH:

12 Q. Can you state your name for the record,
13 please?

14 A. I'm sorry?

15 Q. Can you state your name for the record,
16 please?

17 A. Margi Gilmour.

18 Q. All right. And have you ever had your
19 deposition taken before?

20 A. Yes.

21 Q. On -- on how many occasions?

22 A. Once.

23 Q. And how -- how long ago was that?

24 A. 30 years.

25 Q. Okay. All right. Well, just to go over a

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1 Q. Are you -- are you currently employed?

2 A. No, I am not, I'm retired.

3 Q. Okay. What was the last employment that
4 you had?

5 A. At the Oklahoma State University College
6 of Veterinary Medicine, I was the Associate Dean for
7 Academic Affairs.

8 Q. And for how long were you in -- in that
9 position?

10 A. I was interim for two years, and then I
11 was Associate Dean for three and a half before
12 retirement.

13 Q. Okay. What was your -- do you have a
14 position at the school before that?

15 A. Yes, I did.

16 Q. What was your position then?

17 A. Professor of ophthalmology.

18 Q. And -- and how long were you in -- in that
19 role for?

20 A. I was -- let's see, let me do some math,
21 at the university for 20 years, so I was in that
22 position for 16 years.

23 Q. I see. You said that you were at the
24 university for 20 years; is that right?

25 A. Total, yeah.

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1 A. No.

2 Q. So during your time of involvement with
3 the Oklahoma State University College of Veterinary
4 Medicine program, do you recall a number or estimate
5 of academic integrity violations filed against
6 students specifically participating in the year four
7 clinical program?

8 A. None.

9 Q. None that you can recall?

10 A. (Witness shakes head.)

11 Q. Not a single one?

12 A. Correct.

13 Q. So it would be quite unusual for a faculty
14 member to file an academic integrity violation
15 against a student participating in a year four
16 program?

17 A. Yes.

18 Q. And why is that?

19 A. Year four is very different. You are
20 expected to assimilate a lot of information and act
21 professional and communicate well and you just have
22 to bring everything like that together. And it's
23 not like you have some way you're going to cheat on
24 that. You bring your A game, but there's no way to
25 cheat.

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1 In years one through three, of course, it's
2 very different, you're in a class, there's high
3 stakes, there's exams, there's things to turn in,
4 and there, we have seen some academic integrity
5 issues come up in students looking on another
6 student's paper, or, you know. But fourth year,
7 it's that, you know, doing some action to get ahead
8 or to cheat, it just isn't really applicable in that
9 setting.

10 MR. PRATT: I'll pass the witness.

11 REDIRECT EXAMINATION

12 BY MR. BACH:

13 Q. If you don't mind, I know that you're
14 retired. Is there any reason that you wouldn't be
15 available for -- to attend a trial in September?

16 A. No.

17 Q. So, no, you -- you wouldn't have any --
18 any obstacle to attend a trial, if, in fact, it goes
19 to trial in September?

20 A. No, I would not.

21 MR. BACH: I don't have anything further.

22 MR. PRATT: Okay. We'll read and sign.

23 MR. BACH: All right. Thank you very much
24 for your time here today.

25 (Deposition concluded at 3:42 p.m.)

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JURAT

I, MARGI GILMOUR, do hereby state under oath
that I have read the above and foregoing transcript
in its entirety, and that the same is a full, true,
and correct transcription of my testimony so given
at said time and place, except for the corrections
noted.

Margi Gilmour
MARGI GILMOUR

SUBSCRIBED AND SWORN TO BEFORE ME, the
undersigned Notary Public in and for the State of
Oklahoma on this, the 13 day of
June, 2023.

[Signature]
Notary Public

My Commission Expires: 02-06-27



REPORTED BY: BRENDA SCHMITZ, CSR, RPR

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